

## REMARKS

Applicants respectfully request consideration of this application.

Claims 178 – 180, 184 – 188, and 197 – 200 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 4,834,329 to Delapp (hereinafter “Delapp”) in view of U.S. Patent 5,947,429 to Sweere et al. (hereinafter “Sweere”). Claims 181 – 183 have been objected to as allowable if rewritten in independent form by including all the limitations of the base claim and any intervening claims.

Claims 178 – 200 remain pending in this application. Claim 178 has been amended to define the invention more properly. The amendment is supported by the specification and no new matter has been added. No new claims have been added. No claims have been canceled.

Amended independent claim 178 provides:

A computer controlled display system, comprising:

a flat panel display having a display surface and an input for receiving display data to be displayed on said display surface;

a moveable assembly coupled mechanically to said flat panel display, said moveable assembly having a cross-sectional area which is substantially less than an area of said display surface, said moveable assembly being moveable to allow said flat panel display to be selectively positioned in space relative to a user of said computer controlled display system;

***an anti-torsion cable disposed within said moveable assembly to prevent said moveable assembly to rotate beyond a pre-determined amount,***

a base coupled mechanically to said moveable assembly and to said flat panel display through said moveable assembly, said base housing computer components comprising a microprocessor, a memory, a bus, an I/O (input/output) controller, and an I/O port, wherein said microprocessor is coupled to said input of said flat panel display; and

a counter-balancing spring assembly housed within said moveable assembly, said spring assembly having a proximal end coupled with a biscuit of a display mounting assembly and a distal end coupled with a biscuit of a base rotation assembly. (emphasis added)

Delapp discloses a monitor 2 having a display screen 3 that is supported by a support 4 on a chassis or base 5 that has some processing capability and is adapted to have input/output connections in the form of cartridges plugged into the back thereof. The support 4 comprises generally a lower arm 12 and an upper arm 13 that are interconnected at one end thereof by an elbow hub 14 and are connected at their opposite ends, respectively, to a hub 15 that is adapted to be secured to the turntable 9 and a hub 16 that is adapted to be secured to the monitor 2. (Delapp, col. 2, lines 53 – 68, col. 3, lines 1 – 4, and FIGS. 1 – 2). Nothing in Delapp teaches or suggests an anti-torsion cable disposed within the support (i.e., lower and upper arms) to prevent the support to rotate beyond a pre-determined amount.

Sweere discloses a tabletop flat panel display 800 that includes a support arm 802 having a steel coil spring 810. The tabletop flat panel display 800, with a steel coil spring 810 provides a pulling counterbalance force. Since the steel coil spring is providing a pulling force, the positionable and adjustable gas spring mount 640 is mounted above the support arm 524 horizontal pivot axis. The support arm 802 with a steel coil spring 810 is mounted to angled base 512. (Sweere, col. 12, lines 62 – 68, col. 13, lines 1 – 13, and FIG. 24). Nothing in Sweere teaches or suggests an anti-torsion cable disposed within the support arm to prevent the support to rotate beyond a pre-determined amount. As such, Sweere fails to cure the deficiency of Delapp.

It is respectfully submitted that Delapp and Sweere do not teach or suggest a combination with each other. It would be impermissible hindsight, based on Applicants' own disclosure, to combine Delapp and Sweere.

Applicants respectfully submit that there is no motivation to combine Delapp and Sweere. The Office Action states that "it would have been obvious to a person of ordinary skill in the art at the time the invention was made to provide a computer control system of Delapp with the flat panel display as taught by Sweere, since the device of Sweere would allow the computer system of Delapp to be used in environments with restricted space." (Office Action, 01/28/04, page 3). Here, the Office Action merely states an advantage of substituting the flat panel display from Sweere with the display from Delapp without explaining what specific understanding or technological principle within the knowledge of one of ordinary skill in the art would have suggested the combination. The support arm of Delapp would still be susceptible over-rotation and damage.

Even if Delapp and Sweere were combined, the combination would still not result in all the limitations of claim 178. In particular, nothing in Delapp or Sweere, alone or in combination, teach the limitation of "an anti-torsion cable disposed within said moveable assembly to prevent said moveable assembly to rotate beyond a pre-determined amount." Therefore, Applicants respectfully request the withdrawal of the rejection of the claim 178 under 35 U.S.C. § 103(a) over the combination.

Claims 179 – 180, 184 – 188, and 197 – 200 depend either directly or indirectly from independent claim 178 and thus they include the limitation "an anti-torsion cable disposed within said moveable assembly to prevent said moveable assembly to rotate beyond a pre-determined amount." As such, applicants respectfully submit claims 179 – 180, 184 – 188, and 197 – 200 are also not unpatentable over the combination of Delapp or Sweere under 35 U.S.C. § 103(a) and request removal of the rejection.

In conclusion, Applicants respectfully submit that in view of the arguments set forth herein, the applicable rejections have been overcome. If the allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Suk Lee at

(408) 720-8300. If there are any additional charges, please charge our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: April 28, 2004



---

Suk S. Lee  
Attorney for Applicants  
Registration No. 47,745

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1030  
(408) 720-8300